

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2024-cv-07442

Lucio Celli,

Plaintiff,

v.

AG Garland et al,

Defendants.

**NOTICE OF MOTION FOR LIMITED DISCOVERY TO DEVELOP CLAIMS OF
JUDICIAL BIAS AND PROCEDURAL MISCONDUCT PURSUANT TO *BRACY v.
GRAMLEY*, 520 U.S. 899 (1997)**

PLEASE TAKE NOTICE that, upon the annexed **Motion for Limited Discovery**, the accompanying **Memorandum of Law –it was deleted**, and the prior submissions and evidence in this matter, the undersigned will move this Court, at a time and place to be designated by the Court, for an Order:

1. Granting limited discovery as outlined in the attached motion, pursuant to *Bracy v. Gramley*, 520 U.S. 899 (1997), and the Court's inherent authority to supervise proceedings;
2. Permitting subpoenas or document production requests to court officers and related personnel involved in the alleged suppression of evidence, docket manipulation, and coordinated retaliation;
3. Directing that the administrative and metadata records of Clerk Wolfe, and internal communications between Judge Rearden, Judge Engelmayer, and Judge Livingston, be preserved and disclosed for inspection;
4. And for such other and further relief as this Court deems just and proper.
5. Helping Randi Weingarten, Judge Engelmayer, Clerk Wolfe and Chief Judge Livingston is the issue that is not seen in any of the orders published by her
6. Judge Rearden has a crazy idea—from Wolfe and Randi—“looking back will shield her but the public has the right to know what crimes has she concealed or further for the Cartel, the Senators and Randi—
7. I am not mad that my name was in the paper because I was a public employee and people have the right to know about public money

8. I am mad that the paper obtained my doctor's notes and supposedly, Livingston and Engelmayer's know it is Randi
9. The public had the right to know my arrest but not anything covered under HIPPA because I did not give that permission to anyone.

Political gangs is not frivolous is our founders envisioned what Your Honor has lied about and has distanced herself—as your conduct and that of each judge's conduct is part is political gang whether Your Honor likes it or not.

Forworth Coming Affidavit Supplement – Judicial Misuse of Office by Judge Jennifer Rearden

Factual Record Demonstrating Political Retaliation and Suppression of Constitutional Claims

1. A review of the docket in this matter will confirm that **Judge Jennifer H. Rearden has misused her Article III authority to protect political allies and shield prior judicial misconduct**. Her rulings have deliberately avoided factual development, ignored binding precedent, and failed to address multiple, verified constitutional violations.
2. Notably, Judge Rearden has refused to enforce or even acknowledge **orders previously issued by Judge Paul A. Engelmayer**, which are central to the litigation and form the basis of my requests for relief. This omission is not inadvertent—it is a conscious strategy to **distance herself from the conduct of her judicial colleagues while continuing to suppress the underlying truth**.
3. In **May 2024**, **Probation Officer Cudina** made a statement¹ confirming that the retaliatory actions I experienced—including denial of benefits, interference with judicial filings, and procedural obstruction—were **rooted in directives traceable to Judge Engelmayer and Chief Judge Livingston**. This statement substantiates the existence of **off-record influence** by judicial officers acting in concert with politically motivated actors, including **Randi Weingarten** and officials connected to the “**Schumer Bloc**.”
4. Despite this evidence, Judge Rearden has refused to develop a factual record, address the credibility of Officer Cudina’s statements, or enforce orders that would contradict the cartel’s desired outcome. This conduct amounts to **willful blindness**, a legally recognized doctrine by which knowledge is inferred when a public officer deliberately avoids evidence of illegality.
5. Her silence and strategic distancing do not absolve her of complicity. To the contrary, Judge Rearden’s **refusal to apply controlling authority such as Dennis v. United States, 341 U.S. 494 (1951)**—a case on political conspiracy and systemic suppression of rights—demonstrates judicial evasion, not discretion.
6. These actions reflect a deeper institutional problem: **Judge Rearden is operating in furtherance of a judicial cartel** that includes Chief Judge **Debra Ann Livingston**, Judge **Engelmayer**, and **Randi Weingarten**, all of whom have coordinated to insulate each other from legal exposure and public accountability.

¹ In the Medicaid cab

7. Judge Rearden's conduct must be referred to oversight authorities under **28 U.S.C. § 351**, and meets the constitutional threshold for **impeachment under Article II, § 4**, as defined in **Federalist No. 65**, which considers acts of betrayal of public trust—especially those that injure the judiciary or society at large—as political offenses warranting removal.

DATED: [Date]

Respectfully submitted,

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Certificate of Service

I hereby certify that on [Date], a copy of the foregoing Motion to [Specify Relief Sought] was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

[Attorney's Name]